EXHIBIT I

EXHIBIT 10
UNREDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

1

1   UNITED STATES DISTRICT COURT

2   NORTHERN DISTRICT OF CALIFORNIA

3

4   CISCO SYSTEMS, INC.,

5   Plaintiff,

6   vs.   Civil Action No.

7   ARISTA NETWORKS, INC.,   5:14-cv-5344-BLF

8   Defendant.

9   _____

10

11

12   HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13   PURSUANT TO PROTECTIVE ORDER

14

15   VIDEOTAPED DEPOSITION OF JAYSHREE ULLAL,

16   VOLUME I

17

18   February 25, 2016

19   9:09 a.m. - 6:16 p.m.

20

21   555 Twin Dolphin Drive, 5th Floor

22   Redwood Shores, California

23   REPORTED BY:

24   James Beasley

25   CSR No. 12807, CCR No. 835, RPR

252

1   comma, "user manuals and portions of its

2   source code."

3   Which is what I remember most from the

4   Huawei lawsuit, which is the source code

5   allegations.

6   Q.   Do you also see that Huawei was forced to

7   change the help screens?

8   A.   Three -- where is that? Yes, user

9   manuals, help screens, and portions of its source

10   code.

11   MR. PAK: Let me introduce my next

12   exhibit, which is Exhibit 343.

13   (Ullal Exhibit 343 was marked for

14   identification and attached to the

15   transcript.)

16   (Off-the-record discussion.)

17   BY MR. PAK:

18   Q.   Why don't you take a few minutes to look

19   at this document.

20   A.   Okay.

21   Q.   Okay. Ms. Ullal, I'll represent to you

22   that this is a document that summarizes some of the

23   changes in Huawei's command-line interface commands

24   following the lawsuit settlement that we just

25   discussed earlier.

253

1   A.   Uh-huh.

2   Q.   Okay? For example, Huawei was forced to

3   change the show commands from show to display.

4   Do you see that, those examples?

5   A.   I see that.

6   Q.   Okay. It was forced to change the clear

7   commands from Cisco's CLI to reset commands.

8   A.   Uh-huh.

9   Q.   It was forced to change enable commands to

10   super commands?

11   Do you see that as well?

12   A.   I do.

13   Q.   Okay. Exit to quit and so forth.

14   Do you understand that CLI command

15   expressions could be different without affecting the

16   underlying functionality?

17   A.   They can -- they are industry standard

18   methods of communication, but there are different

19   words; is that what you mean?

20   Q.   Yes.

21   A.   Yeah, there can be different choice of

22   words.

23   Q.   Okay. So when you say it's industry

24   standard in that context, you're talking about the

25   means which is using a command line text entry on a

254

1   screen?

2   A.   No, I mean they come from UNIX commands or

3   deck top commands, you know. So whether you say

4   "show" or "display," these are all prior English

5   words that were used in CLI. CatOS used display,

6   IOS used show. So even the Cisco operating systems

7   there are two different ways saying it.

8   Q.   Okay. So when you talk about industry

9   standard, you're not saying that there's only one

10   way in the industry to specify a command --

11   multi-word command for any of these features?

12   That's not what you're saying?

13   A.   I'm not making any --

14   MR. FERRALL: Objection.

15   THE WITNESS: -- comment on multi-word --

16   MR. FERRALL: Vague and ambiguous.

17   You can -- you can answer.

18   THE WITNESS: I'm not making any comment

19   on multi-words. I'm talking about when Cisco refers

20   to industry standard commands these are standard

21   words that are used in normal course of network

22   communication like the English languages.

23   And just like a keyboard or a mouse or a

24   display, there's -- there's -- there's no

25   originality. There's standard words.

255

1   BY MR. PAK:

2   Q.   But you're not talking, for example,

3   about -- when you say: "industry standard CLI,"

4   you're not talking about the combination of words,

5   for example: Write terminal show running config;

6   that's not what you're talking about, correct?

7   A.   I guess I cannot -- I'm not the expert.

8   I -- I don't know why I'm asked to define what Cisco

9   means by industry standard CLI. They use that word

10   all the time in their literature.

11   Q.   What I want to do is -- this is my

12   deposition of you. I want to understand your

13   understanding of that word?

14   A.   Of Cisco's datasheet?

15   Q.   Yes. So when you see the word "industry

16   standard CLI," were you thinking Cisco's talking

17   about all the different multi-word combinations that

18   they used or are they talking about the fact that

19   using a command-line interface is a common way of

20   communicating with routers and switches?

21   A.   So let's pick an example, if that would

22   help.

23   Show ip route. And back in my

24   Ungermann-Bass days we used show xns route, where

25   now the routing protocol is IP instead of XNS.